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March 3, 2025

By ECF

Hon. Barbara Moses
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In Re Kobalt Music Publishing America, Inc. Coordinated Copyright Cases

Judge Moses:

Pursuant to Paragraph 3.a. of the Court's Individual Practices, Defendants in the above coordinated cases write to request leave to file under seal portions of a deposition transcript that has been designated "confidential" by non-party TuneSat LLC. On January 21, 2025, Defendants took the deposition of Chris Woods, TuneSat's Chief Operating Officer. During the deposition, counsel for TuneSat requested that the deposition be treated as confidential under a protective order entered in a related case pending in the Southern District of New York, *Artist Publishing Group, LLC, et al. v. Orlando Magic, Ltd.*, No. 24-cv-5461.

Defendants intend to file limited excerpts of Mr. Woods' deposition transcript in support of their motion to compel the production of documents from TuneSat. Pursuant to Paragraph 3.c. of the Court's Individual Practices, Defendants have filed the relevant excerpts of Mr. Woods' transcript under seal with this letter, by ECF, for the Court's review. While Defendants do not believe that Mr. Woods' transcript contains any proprietary or otherwise sensitive information, Defendants do not oppose TuneSat's request to maintain confidentiality for the few transcript pages Defendants will file in support of their motion to compel.

For the foregoing reasons, Defendants request that the Court grant them permission to file under seal the excerpts of Mr. Woods' deposition transcript submitted with this letter.

Respectfully submitted,



David Slovick